

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	Case No. 23-22168-JAD
	)	
	)	Chapter 13
Jerrold M. Howard	)	
Debtor	)	Doc. No.:
	)	
	)	Related to Claim No.: 3
Jerrold M. Howard	)	
Movant	)	
v.	)	
	)	
U.S. Bank Trust National Ass. etal and	)	
Ronda J. Winnecour, Trustee,	)	
Respondents	)	

**DECLARATION**

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to U.S. Bank Trust National Association's Notice of Mortgage Payment Change dated May 3, 2024, the Debtor's current escrow payment for account number ending in **9277** is **\$178.55**. The new escrow payment is **\$174.93**. The new total mortgage payment is **\$644.48** effective June 21, 2024. The Debtor will pay the escrow shortage in addition to his regular monthly Chapter 13 plan payment.

Dated: **May 7, 2024**

Respectfully submitted by:  
**/s/ Jerrold M. Howard**  
Jerrold M. Howard

Dated: **May 7, 2024**

Respectfully submitted by:  
**/s/ Albert G. Reese, Jr., Esquire**  
Albert G. Reese, Jr., Esquire  
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